

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JANE DOE,

Plaintiff,

Civil Case No: 23-cv-4910-ALC

-against-

JOSHUA JACKSON, individually,
DEGUENE KEITA, individually,
FATOUMATA KEITA a/k/a NAOMI KEITA,
individually,
JEOFFREY JANVIER, individually and
JOHN DOE, individually,

Defendants.

**DECLARATION OF PLAINTIFF, JANE
DOE IN SUPPORT OF PLAINTIFF'S
MOTION TO PROCEED
PSEUDONYMOUSLY**

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I, [REDACTED] [Jane Doe], declare under penalty of perjury, that the following is true and correct:

1. I am the Plaintiff in the above-captioned action.
2. This Declaration is submitted in support of my motion to proceed in this case as “Jane Doe.”.
3. After Defendant Jackson raped and sexually assaulted me in his hotel room on February 14, 2022, and as I was on my way home, I began to receive numerous threatening text messages, which among other things, falsely accused me of stealing a watch that purportedly belonged to Defendant Jackson.
4. Exhibit 1 attached to this declaration is a true and correct copy of a string of text messages I received from an unknown sender (named as Defendant “John Doe” in the Complaint). In this string of text messages, the sender threatened me on behalf of Defendant Jackson, by stating

“I’m ready to pull up on [you]” then texting me my address to show me they knew where I lived. The threats continued: **“You finished”**; **“...u gone find out the hard way I guess”** ; **“just know I know who [you] are and [you] put yourself in a bad position”**; **“You do realize all of us have [your] info and [address]”**

5. These text messages clearly communicated a threat to my wellbeing sent on behalf of Defendant Jackson that made me fear for my life.

6. Exhibit 2 attached hereto is a true and correct copy of a chain of text messages sent to me by Defendant Jeoffrey Janvier, that he also began sending to me after I left Defendant Jackson’s hotel room where he raped and sexually assaulted me.

7. In these text messages, Defendant Janvier also falsely accused me of stealing a purported watch from Defendant Jackson, and began communicating threats on behalf of Defendants Jackson, stating: **“I [direct messaged] you so [you] can see I’m official and its not a game”**; **“I assure [you] it will cause problems [you] don’t want”**; **“They wanted to pull up to [your] address and wait [until you] arrived back home but I told them there no need for goons they can just have the law deal with it so they gonna go that route if it don’t get situated”**.

8. Defendant Janvier threatened that Defendant Jackson would call the police on me regarding this purported watch and I repeatedly urged these people texting me that they *should* contact the police about any missing watch, but that I did not know anything about it.

9. I was still in shock from being raped and sexually assaulted by Defendant Jackson and I just wanted to be left alone, but the threats from Defendant Janvier on Defendant Jackson’s behalf persisted, as he continued to text me: **“... do [you] really want [your] name affected and blown up like that!”**; **“[your] name will be dragged thru the mud and then some and [you]**

won't be able to do anything..."; **"We have [your] address I told them give me [until] noon before they go to the next step"; "They telling me [you're] still acting dumb and they know [you] got it so I guess [you] want the problems"; "They gonna put [you] on blast first on social media..."**

10. I texted Defendant Janvier that I didn't steal any watch and that I didn't want Defendant Jackson or any of his people to hurt me, to which Defendant Janvier responded: **"... trust me it's gonna go that far..."**

11. Defendant Janvier then threatened to bring the false allegations about the watch to a celebrity gossip website called The Shade Room, stating: **"They already having me contact the shade room to blow [you] up!"**; and he continued with threats such as: **"This is gonna get bigger and bigger trust me"**, Janvier continued the threatening texts and warned me about Defendant Jackson's purported wealth and followed up with false allegations that they would seek criminal charges against me.

12. Exhibit 3 attached hereto is a true and correct copy of the police report from when I reported to the NYPD Special Victims Squad that Defendant Jackson raped and sexually assaulted me in his hotel room.

13. Exhibit 4 attached hereto are true and correct copies of the orders of protection issued against Defendants Naomi and Deguene Keita, after they were apprehended by the NYPD after breaking into my apartment and robbing me at Defendant Jackson's behest.

14. Exhibit 5 attached hereto is a true and correct copy of an incident report from the NYPD after I reported that an individual named Lowell Ulmer began harassing me online apparently at the behest of Defendant Jackson, which Mr. Ulmer admitted in his harassing comments to me on Instagram Live.

15. Exhibit 6 attached hereto are a true and correct copy of the criminal charging papers against Defendants Naomi and Degeune Keita for breaking into my apartment, threatening my life and robbing me at Defendant Jackson's behest.

16. Even though I repeatedly urged these individuals who sent me these threatening texts to call the police about the purported missing watch, I was never contacted by the police about it.

17. These threats, harassment and crimes committed against me by the defendants in this case have caused me severe emotional trauma, and they have threatened to publicize and smear my name in connection to this case.

18. If I am required to move forward in this case under my true identity, I fear that the Defendants will follow through with their documented threats to publicly attempt to humiliate and harass me for pursuing the vindication of my rights in this case.

July 7, 2023


[Redacted] Jane Doe]

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